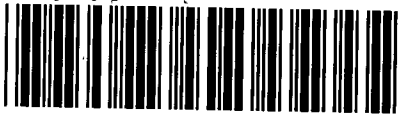


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PUC DOCKET NO. 46674

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APPLICATION OF SUBURBAN
UTILITY COMPANY, INC. FOR
AUTHORITY TO CHANGE RATES

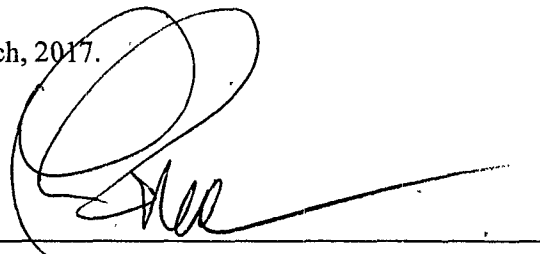
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BEFORE THE STATE OFFICE
OF PUBLIC UTILITY COMMISSION
FILING CLERK
ADMINISTRATIVE HEARINGS

**SUBURBAN UTILITY COMPANY, INC.' OBJECTIONS TO OFFICE OF PUBLIC
UTILITY COUNSEL'S THIRD REQUEST FOR INFORMATION
QUESTIONS NOS. 3-12, 3-13, 3-15, AND 3-16**

Pursuant to Chapter 16, et. seq. of the Texas Administrative Code, §22.144 ("TAC"), and Rules 190-198 of the Texas Rules of Civil Procedure, SUBURBAN UTILITY COMPANY, INC. ("SUBURBAN UTILITY") hereby submits these objections to Office of Public Utility Counsel's ("OPUC") Third Request for Information to SUBURBAN UTILITY, Questions Nos. 3-12, 3-13, 3-15 and 3-16. SUBURBAN UTILITY will supplement its objections should it become aware of any additional information.

Respectfully submitted this 14th day of March, 2017.



Les Romo
Law Offices of Les Romo
102 West Morrow Street, Suite 202
P.O. Box 447
Georgetown, Texas 78627
(512) 868-5600
Fax: (512) 591-7815
State Bar No. 17225800
lesromo.lawoffice@gmail.com

ATTORNEY FOR SUBURBAN UTILITY COMPANY, INC.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing and the following Objections to the OPUC's Third Request for Information to Suburban Utility Company, Inc. were served on the known

parties to date on the 14th day of March, 2017 by either First Class Mail, or Facsimile Transmission or hand delivery..



Les Romo

**SUBURBAN UTILITY COMPANY, INC.'S OBJECTIONS TO
TO OPUC'S THIRD REQUEST FOR INFORMATION
QUESTIONS NOS. QUESTIONS NOS. Staff 3-12, 3-13, 3-15 and 3-16.**

- 3-12.** Please provide the total management compensation paid during the Test Year to Mike Martin by the following:
- a. Community Utility Company
 - b. Consumers Water, Inc.
 - c. Patton Village Water Co., Inc.
 - D. Stone Hedge Utility Co.

RESPONSE: OBJECTION: SUBURBAN UTILITY is the Applicant pursuant to 16 TAC §22.2(5) in this case. SUBURBAN UTILITY is not affiliated with any of the companies covered in the above-stated request as the term "affiliate" is defined by 16 TAC §24.3(6). SUBURBAN UTILITY does not control nor possession of any documents related to the above-listed companies, has no control over any of these companies nor can it provide documents and information and materials that are owned by these companies. Mike Martin is not the Applicant in this case and is not individually subject to the jurisdiction of the Administrative Law Judge nor the State Office of Administrative Hearings, and SUBURBAN UTILITY does not have control nor access to any documents and information owned and possessed by Mr. Martin and cannot provide documents owned and controlled by him. Discovery of information from Mr. Martin must be directed to Mr. Martin.

- 3-13.** Please provide the total management compensation paid during the Test Year to Mitch Martin by the following:
- a. Community Utility Company
 - b. Consumers Water, Inc.
 - C. Patton Village Water Co., Inc.
 - D. Stone Hedge Utility Co.

RESPONSE: OBJECTION: SUBURBAN UTILITY is the Applicant pursuant to 16 TAC §22.2(5) in this case. SUBURBAN UTILITY is not affiliated with any of the companies covered in the above-stated request as the term "affiliate" is defined by 16 TAC §24.3(6). SUBURBAN UTILITY does not control nor possession of any documents related to the above-listed companies, has no control over any of these companies nor can it provide documents and information and materials that are owned by these companies. Mitch Martin is not the Applicant in this case and is not individually subject to the jurisdiction of the Administrative Law Judge nor the State Office of Administrative Hearings, and SUBURBAN UTILITY does not have control nor access to any documents and information owned and possessed by Mr. Martin and cannot provide documents owned and controlled by him. Discovery from Mr. Martin must be directed to Mr. Martin.

3-15. Please indicate the person(s) and company(ies) responsible for the management and policies of the following:

- a. MBC Water Systems
- b. Suburban Utility Company
- c. Community Utility Company
- b. Consumers Water, Inc.
- C. Patton Village Water Co., Inc.
- D. Stone Hedge Utility Co.

RESPONSE: OBJECTION: SUBURBAN UTILITY is the Applicant pursuant to 16 TAC §22.2(5) in this case. SUBURBAN UTILITY is not affiliated with Community Utility Company, Consumers Water, Inc., Patton Village Water Co., Inc. nor Stone Hedge Utility Co, covered in the above-stated request as the term "affiliate" is defined by 16 TAC §24.3(6). SUBURBAN UTILITY does not control nor possession of any documents nor inside information not known to the OPUC related to the above-listed companies, has no control over any of these companies nor can it provide documents and information and materials that are owned by these companies. Discovery of information from these companies must be directed to these companies.

3-16. Please provide the names of the officers of the following:

- a. MBC Water Systems
- b. Suburban Utility Company
- c. Community Utility Company
- b. Consumers Water, Inc.
- C. Patton Village Water Co., Inc.
- D. Stone Hedge Utility Co.

RESPONSE: OBJECTION: SUBURBAN UTILITY is the Applicant pursuant to 16 TAC §22.2(5) in this case. SUBURBAN UTILITY is not affiliated with Community Utility Company, Consumers Water, Inc., Patton Village Water Co., Inc. nor Stone Hedge Utility Co, covered in the above-stated request as the term "affiliate" is defined by 16 TAC §24.3(6). SUBURBAN UTILITY does not control nor possession of any documents nor inside information not known to the OPUC related to the above-listed companies, has no control over any of these companies nor can it provide documents and information and materials that are owned by these companies. Discovery of information from these companies must be directed to these companies.